



Advocates for Workplace Fairness

August 17, 2020

Via CM/ECF

The Honorable Gabriel W. Gorenstein
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (KMW) (GWG)

Dear Judge Gorenstein:

Along with co-counsel, we represent Plaintiffs and opt-in Plaintiffs in the above-referenced matter. Pursuant to the Court's July 16, 2020 Minute Order, we write jointly with Defendant to provide the Court with a status report.

The parties have begun discovery. The parties exchanged initial disclosures on August 3, 2020 and served initial request for production of documents and interrogatories on August 14, 2020. The parties also are negotiating an ESI protocol.

Currently fully briefed and pending before the Court are: (1) Plaintiffs' Motion for Conditional Certification of a Collective and Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b), ECF No. 32; (2) Defendant's Motion to Dismiss, ECF No. 110, which is currently pending before Judge Wood; and (3) Defendant's Limited Motion to Stay Discovery, ECF No. 134.

Respectfully submitted,

/s/ Sally J. Abrahamson

Sally J. Abrahamson

CC: All Counsel of Record (via ECF)